

**Alpeak Broadcasting Corporation
75 Beattie Place
9th Floor
Greenville, South Carolina 29601-1142**

August 5, 1996

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, DC 20554

Re: MM Docket 96-120

Dear Mr. Caton:

Transmitted herewith on behalf of Alpeak Broadcasting Corporation, licensee of FM radio station WPEK, Seneca, South Carolina, is an original and four (4) copies of its Reply Comments in the above-referenced proceeding.

Should you or the staff have any questions, kindly contact David E. Alpert, Vice President, Alpeak Broadcasting Corporation at: 75 Beattie Place, 9th Floor, Greenville, South Carolina 29601-1142 (phone - 864/232-9810).

Sincerely,



Susan A. Burk

Enclosures

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

RECEIVED

AUG 5 1996

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In the Matter of)	
)	
Grandfathered Short-Spaced)	MM Docket No. 96-120
FM Stations)	RM-7651

To: The Commission

REPLY COMMENTS OF ALPEAK BROADCASTING CORPORATION

Alpeak Broadcasting Corporation ("Alpeak"), licensee of FM station WPEK, Seneca, South Carolina, hereby submits its Reply Comments in response to the Notice of Proposed Rule Making ("Notice") in the above-captioned proceeding.

Alpeak supports the comments of petitioners and others in this proceeding who favor modification of Section 73.213 of the Rules of the Commission. These Reply Comments illustrate the public interest benefits that would accrue to listeners in Alpeak's service area by virtue of modification of the Rule as proposed.

As set forth in the attached engineering statement of Bernard R. Segal, P.E., WPEK is a Class C station operating at 100 kw with a directional antenna. Adoption of the proposed revision of Section 73.213 would permit WPEK to operate with a non-directional antenna, thereby increasing its coverage. See Exhibit A attached hereto and made a part hereof.

For the foregoing reasons, Alpeak Broadcasting Corporation respectfully requests that the Commission adopt the proposed revision of Rule Section 73.213.

Respectfully submitted,

ALPEAK BROADCASTING CORPORATION

By: 
Norman R. Alpert
President

August 2, 1996

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EXHIBIT A

Bernard R. Segal, P.E.
Consulting Engineer
Washington, DC

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Exhibit A

**ENGINEERING STATEMENT
PREPARED ON BEHALF OF
ALPEAK BROADCASTING CORPORATION
SENECA, SOUTH CAROLINA**

The instant engineering statement has been prepared on behalf of Alpeak Broadcasting Corporation (Alpeak) in support of Reply Comments in MM Docket Number 96-120, RM-7651 concerning grandfathered short-spaced FM stations. Alpeak is the licensee of station WPEK, Seneca, South Carolina. The station operates on channel 251C with maximum effective radiated power of 100 kilowatts. A directional antenna is employed with suppression toward grandfathered short-spaced stations WBRF, Galax, Virginia, and WPEG, Concord, North Carolina; the former on channel 251C and the latter on channel 250C.

The FCC's proposal to eliminate the present constraint which limits the extent of the 1 mV/m contour in the direction of a grandfathered short-spaced station when a facility change is desired and to substitute therefor an interference-based determination, at least insofar as cochannel and first adjacent short spacings are concerned, is favored by Alpeak.

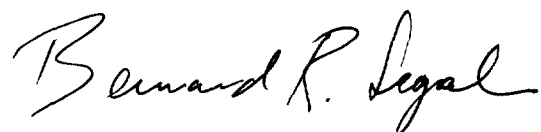
Bernard R. Segal, P.E.
Consulting Engineer
Washington, DC

Engineering Statement
WPEK, Seneca, South Carolina

Exhibit A
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An analysis based on the rule as proposed to be modified, would permit Alpeak to eliminate the directional antenna currently employed and to substitute in its place a nondirectional antenna. The currently employed directional antenna, not only suppresses radiation in the directions of the short-spaced stations, but because of the practical limitations in directional antenna design, suppresses the signal in the directions of certain populated areas. Under the proposed rule, WPEK could employ a nondirectional antenna and achieve improved coverage in those populated areas and so provide greater benefit to the public by affording improved reception of its signal.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 2, 1996.



Bernard R. Segal, P.E.

CERTIFICATE OF SERVICE

I, Susan A. Burk, do hereby certify that a true and correct copy of the foregoing "Reply Comments of Alpeak Broadcasting Corporation " was served by hand delivery on the 5th day of August, 1996, upon the following individuals:

Hon. Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, DC 20554

Hon. James H. Quello
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, DC 20554

Hon. Rachelle B. Chong
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, DC 20554

Hon. Susan Ness
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, DC 20554


Susan A. Burk